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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 DEBORAH CARROLL,) Case No. 2:18-cv-00960-JCM-BNW
9)
10 Plaintiff,) **STIPULATION AND ORDER TO**
11 v.) **EXTEND TIME FOR PLAINTIFF**
12 LADAH LAW FIRM PLLC; and RAMZY) **TO RESPOND TO**
13 LADAH;) **DEFENDANTS' MOTION FOR**
14 Defendants.) **SUMMARY JUDGMENT**
15) **(SECOND REQUEST)**
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The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 22) from the current due date of Monday, October 28, 2019 through and including Monday, November 18, 2019.

This is the second request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

- 23 1. Plaintiff's counsel underwent surgery on October 18, 2019 and the recovery
24 process has been slower than anticipated and he has been restricted from
25 working since that date with instruction specifically not to undertake any tasks
26 that require concentration or sign any important documents.
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2. Plaintiff's counsel was only able to work two half days in the past week and that was mostly occupied by meetings with clients and catching up on the mail.

3. Plaintiff's counsel still has a Ninth Circuit Brief due on November 4, 2019.

4. Plaintiff's counsel has a workers' compensation Judicial Review appellate brief due October 28, 2019.

5. Plaintiff's counsel has a motion to dismiss response due on October 30.

6. Plaintiff's counsel is in the process of drafting three complaints on new matters.

7. Plaintiff's counsel has numerous client meetings, administrative hearings, and depositions scheduled in the coming weeks

8. Plaintiff's counsel has to travel to Los Angeles for a Mediation on October 30. He also has several ENE sessions and a Nevada Supreme Court Settlement Conference in the next few weeks

9. Plaintiff's counsel has also not had time to meet with the Plaintiff in this case to work on preparing the summary judgment response. She has been provided copies of the materials and is looking at it. It is expected that due to the nature of the other evidence in the case an extensive declaration will need to be prepared for Ms. Carroll. The Opposition will be very detail and fact oriented and will take many hours to complete.

10. Meanwhile Defense counsel has informed Plaintiff's counsel regarding his own heavy workload, including three ENE sessions in a four day period in early November, and requested that the opposition deadline be moved out to

1 after November 15 to accommodate his workload as well. Thus the parties
2 have chosen November 18, 2019 as that is a Monday and will give counsel the
3 weekend to finish up the opposition if necessary.
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5 This stipulation to extend the deadline is made in good faith and not for purposes of
6 delay.
7

October 28, 2019.

8 KEMP & KEMP

9 FISHER & PHILLIPS LLP

10 By: /s/ James P. Kemp, Esq.
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14 Attorneys for Plaintiff

By: /s/ Scott M. Mahoney, Esq.
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15 IT IS SO ORDERED:
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18 HON. JAMES C. MAHAN, DISTRICT JUDGE

19 Dated: October 30, 2019

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